

Environmental Science and Waste Technology (E) Environmental Restoration, MS M992 Los Alamos, New Mexico 87545 505-667-0808/FAX 505-665-4747



U.S. Department of Energy Los Alamos Area Office, MS A316 Environmental Restoration Program Los Alamos, New Mexico 87544 505-667-7203/FAX 505-665-4504

Date: August 7, 2000 Refer to: ER2000-0381

Mr. John Kieling NMED-HWB P.O. Box 26110 Santa Fe. NM 87502

SUBJECT: CLASS I PERMIT MODIFICATION REQUEST, NO FURTHER ACTION PROPOSALS, AUGUST 2000

Dear Mr. Kieling:

In accordance with 20 NMAC 4.1 Subpart IX, et. seq., the Department of Energy (DOE) and the Los Alamos National Laboratory (the Laboratory) request a Class I permit modification to Module VIII of the Laboratory's Hazardous Waste Facility Permit. The Laboratory Environmental Restoration (ER) Project is making this request per the mutual agreement of the New Mexico Environment Department, the DOE, and the ER Project as discussed in the January 26, 2000 monthly meeting summary.

This Class I permit modification request proposes the removal of the following eight solid waste management units (SWMUs) from the permit.

SWMU	STRUCTURE	SWMU
NUMBER	NUMBER	DESCRIPTION
SWMU 16-010(c)	TA-16-388	an active burn site
SWMU 16-010(d)	TA-16-399	an active burn site
SWMU 16-010(b)	TA-16-387	a burn site currently
		undergoing RCRA closure
SWMU 16-010(e)	TA-16-401	an active HE filter vessel
SWMU 16-010(f)	TA-16-406	an active HE filter vessel
SWMU 39-004(c)	TA-39-6	an active firing site
SWMU 39-004(d)	TA-39-57	an active firing site
SWMU 50-001(a)	TA-50-1	an active waste treatment
		facility

Seven of these SWMUs are currently active Resource Conservation and Recovery Act (RCRA) hazardous waste management units operated under interim status. One of these SWMUs [16-010(b)] is currently in the process of undergoing RCRA closure under 40 CFR 265 closure requirements, but was formerly operated as an interim status unit. Because these SWMUs continue to be or were formerly operated as interim status

units under 20 NMAC 4.1, Subpart VI, the Laboratory is requesting their removal from Module VIII of the Laboratory's Hazardous Waste Facility Permit. A Class I permit modification is the appropriate vehicle to remove all eight units from the permit.

This submittal includes three copies of this letter requesting a Class I permit modification and a certification statement signed by the designee owner and operator of the Laboratory.

If you have any further questions regarding this request for permit modification, please contact Dave McInroy at (505) 667-0819 or Joe Mose at (505) 667-5808.

Sincerely,

Sincerely,

Julie A. Canepa, Program Manager Los Alamos National Laboratory Environmental Restoration Theodore J. Taylor, Program Manager Department of Energy Los Alamos Area Office

JC/TT/LN/vn

Cy:

M. Baker, E/DO, MS J591

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